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MEMO ENDORSED

May 1, 2020

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BY ECF

Hon. Valerie E. Caproni
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: Alex Goldfarb v. Channel One Russia and RT America a.k.a
Ano TV-Novosti, Index No.: 18-CV-08128 (DAB)

Dear Judge Caproni:

We represent plaintiff Alex Goldfarb in the above-referenced action. All of the parties join in this report as required by the Court's order issued on April 9, 2020.

The parties have agreed, subject to the Court's approval, on the following schedule for jurisdictional discovery: May 11, 2020 – last day for service of interrogatories and document demands; June 11, 2020 – last day for responses to interrogatories and document demands; June 30, 2020 – last day to request depositions, if any; July 31, 2020 – last day to complete depositions, if any; and August 17, 2020 – last day for defendants to file any renewed motion to dismiss for lack of personal jurisdiction, with answering and reply papers to be filed as required by the SDNY local rules.

The parties propose these dates subject to their understanding that some adjustment of these dates may be required given the current public health situation. If the parties believe that any such adjustment is required, they will promptly inform the Court and request the Court's approval.

Respectfully,



Bertrand C. Sellier

BCS:als

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cc: Nicole Erb, Esq. (via email)
Matthew Leddicotte, Esq. (via email)
David Rivkin, Esq. (via email)
Johnathan New, Esq. (via email)

Application GRANTED. The above
schedule is adopted.

SO ORDERED.



5/1/2020

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE